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Attorneys for Plaintiffs  
YEAYO RUSSELL, an individual and  
as Guardian Ad Litem for minor D.F.

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

YEAYO RUSSELL, an individual and  
as Guardian Ad Litem for minor D.F.,

Plaintiffs,

vs.

COUNTY OF LOS ANGELES, a  
public entity, TIMOTHY GARDNER,  
and DOES 2-10 inclusive,,

Defendants.

Case No.: 2:23-cv-05979-KK-SK

**JOINT NOTICE OF  
CONDITIONAL SETTLEMENT  
PENDING BOARD APPROVAL  
AND MINOR'S COMPROMISE  
MOTION AND REQUEST TO  
VACATE ALL DATES**

TO THIS HONORABLE COURT:

PLEASE TAKE NOTICE THAT the parties hereby submit the following  
Notice of Conditional Settlement and request to vacate all pending dates and stay  
all proceedings in the anticipation of the consummation of the terms of the  
settlement.

WHEREAS, the parties participated in mediation on July 16, 2024, with the  
assigned ADR panel mediator. At the conclusion of the mediation, a mediator's

1 proposal was provided to the parties. Counsel for the County of Los Angeles  
2 advised that any settlement would be contingent upon approval from the County's  
3 Board, and counsel agreed to present and recommend the amount set forth in the  
4 mediator's proposal to said Board at the next meeting, scheduled in mid-August  
5 2024.

6 WHEREAS, if the conditional settlement is approved, then Plaintiffs will be  
7 filing a petition for approval of the compromise of the claims of the minor  
8 plaintiffs. The Plaintiffs anticipate filing the minors' compromise within 45 days  
9 of the settlement's approval by the Board.

10 WHEREAS, Defendant Gardner's responsive pleading is not yet due, the  
11 parties agree that said pleading is stayed until the conditional settlement process is  
12 completed. If the conditional settlement is not approved, then Defendant Gardner  
13 will have 30 days to file a responsive pleading from the date of non-approval.

14 Accordingly, the parties, by and through their counsel of record, respectfully  
15 request that the Court vacate all pending dates and stay all proceedings pending the  
16 Board's approval of the settlement and in anticipation of the subsequent filing of  
17 the minors' compromise and consummation of the terms of the settlement.

18 DATED: 07/22/24

BRAD GAGE LAW, APC

19 By: /s/ Milad Sadr

20 BRAD GAGE

21 MILAD SADR

Attorneys for Plaintiffs

22  
23 DATED: 07/22/24

CARPENTER, ROTHANS & DUMONT LLP

24 */s/ Kimberly Sarmiento*

25 By: \_\_\_\_\_

26 STEVEN J. ROTHANS

27 KIMBERLY SARMIENTO

Attorneys for Defendant,

28 County of Los Angeles